

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

ANNUAL COMPLIANCE REVIEW, 2019

Docket No. ACR2019

ANSWER OF THE UNITED STATES POSTAL SERVICE IN RESPONSE TO  
STEVE HUTKINS' MOTION FOR ISSUANCE OF INFORMATION REQUEST

(January 21, 2020)

Pursuant to 39 CFR § 3001.21(b), the United States Postal Service hereby files this Answer in response to the Motion for Information Request filed by Steve Hutkins on January 15, 2020 ("January 15, 2020 motion").

Mr. Hutkins' new motion seeks detailed information concerning Post Office suspensions and discontinuances, contract retail units (CPOs, CPUs, and VPOs), and the Collection Point Management System (CPMS).<sup>1</sup> As Mr. Hutkins concedes in his January 15, 2020 motion, the Commission has seen no need to request this type of information in the last few years.<sup>2</sup> These circumstances strongly suggest that the value of these data to the Commission for purposes of evaluating compliance is not as great as Mr. Hutkins' motion claims. There is real burden to Postal Service staff in

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<sup>1</sup> Mr. Hutkins filed a similar motion seeking information on these matters in the ACR2015 docket. See PRC Docket No. ACR2015, Steve Hutkins Motion for Issuance of Information Request, January 20, 2016. The Commission subsequently issued Chairman's Information Request (ChIR) No. 6, which appears to be based on some of the specific questions posed in Mr. Hutkins' January 20, 2016 motion. See Chairman's Information Request No. 6, January 22, 2016.

<sup>2</sup> See Hutkins January 15, 2020 motion at 2-4.

responding to these inquiries. For example, the CPMS data requested<sup>3</sup> must be extracted and organized in very large files that require extraordinary measures simply to transfer internally. The utility of data at this level of granularity to the task faced by the Commission in the ACR process is far from evident. Consequently, the Postal Service remains unconvinced that any of the data requested by Mr. Hutkins are actually necessary to the Commission's task of "conducting core regulatory analysis" as Mr. Hutkins alleges.<sup>4</sup>

Nonetheless, the Postal Service particularly opposes any information beyond what has been provided in the past. Mr. Hutkins' January 15, 2020 motion seeks much more extensive information than he sought in the ACR2015 docket. Obtaining this additional information would present even more of an unreasonable burden to Postal Service staff, and would produce little to no value to the Commission in its analysis.

For example, Mr. Hutkins' Proposed Information Request No. 1 seeks several more detailed items for all post office suspensions as of the end of FY 2016 and any subsequent suspensions, including such matters as number of comments received, number of questionnaires received, and place of discontinuance meeting with community. Researching hundreds of suspension/discontinuance files (with potentially hundreds of pages per file) to find where meetings were held and number of comments received would present a severe administrative burden to Delivery Operations

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<sup>3</sup> See Hutkins January 15, 2020 motion, Proposed Information Request No. 4.

<sup>4</sup> See Hutkins January 15, 2020 motion at 1.

personnel. In addition, it is not clear whether any Postal Service computer database tracks locations of every meeting held or other minute details of the suspension and discontinuance process, meaning Delivery Operations personnel would need to undertake the labor-intensive effort of manually reading through each file to obtain these details.<sup>5</sup>

Accordingly, the Postal Service opposes Mr. Hutkins' January 15, 2020 Motion for Issuance of Information Request, in particular any additional details beyond those sought by the Commission in its ChIR No. 6 issued in the ACR2015 docket.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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<sup>5</sup> Postal Service counsel can work with various departments within Delivery Operations, IT, etc., to determine whether any database has such capabilities. However, in the interest of time, since 39 CFR § 3001.21(b) requires a response to Mr. Hutkins' January 15, 2020 motion within seven days, the decision was made to file a response on today's date.